



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Case Management

Mail Code 401-05F

P.O. Box 420

Trenton, New Jersey 08625-0420

Telephone: 609-633-1455

CHRIS CHRISTIE

*Governor*

KIM GUADAGNO

*Lt. Governor*

BOB MARTIN

*Commissioner*

December 16, 2016

Kimberly O'Connell  
Section Chief, Southern NJ Remediation Section  
NJ Remediation Branch, Emergency & Remedial Response Division  
EPA Region 2  
290 Broadway, 19th Floor  
New York, NY 10007

Re: Chevron's Justification for Transition to Monitored Natural Attenuation/No Further Action for Benzene Impacts at SWMU 19, October 17, 2016  
Chevron USA, Inc.  
Perth Amboy, Middlesex County, New Jersey  
SRP PI# 003621  
RPC000005

Dear Ms. O'Connell,

The New Jersey Department of Environmental Protection (Department, NJDEP) has completed review of Chevron's above document, which was submitted pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (TRSR).

The Department accepts the October 17, 2016 report findings that the SWMU 19 area does not meet the active remediation triggers established for benzene in soil and ground water through the Corrective Measure Study and the HSWA permit.

The report provided documentation that a prior 2003 isolated soil sample exceedance reporting within SWMU 19 was due to a laboratory conversion error, so soil samples in the immediate vicinity of SWMU 19 do not exceed the active remediation trigger for soil (13 mg/kg). The SWMU 19 area will be part of the ground water monitored natural attenuation area due to the presence of low levels of benzene (up to 16 ug/L), and up to 46 ug/L in the PAOC 6 gasoline blender area.

The area north of SWMU 19 that has soil and ground water benzene impacts will be further investigated and addressed as part of SWMU 35, including but not limited to, soil impacts at and around S1231, and ground water impacts at MW-352, MW-396, and H1419, and deeper well MW-403 (Figure 5 of the October 17, 2016 document).

If you have any questions, please contact me at 609-292-3007.

Sincerely,

A handwritten signature in cursive script that reads "Anne Pavelka".

Anne Pavelka PG, CHMM

Case Manager

Bureau of Case Management

C: Jill Monroe, BGWPA

John Boyer, BEERA

Bob Mancini, Chevron